

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,  
THE EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO, AND  
THE PUERTO RICO PUBLIC BUILDINGS  
AUTHORITY,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF NO  
OBJECTION OF FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO TO THE OFFICE OF THE COURTS  
ADMINISTRATION OF THE COMMONWEALTH OF PUERTO RICO'S  
MOTION FOR LEAVE TO FILE LEGAL BRIEF AS AMICUS CURIAE**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico ("Oversight Board"), on its own behalf and in its capacity as sole Title III representative for the Commonwealth of Puerto Rico (the "Commonwealth"), the Employees Retirement System of the Government of the

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) the Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 17-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Public Buildings Authority (“PBA”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)<sup>2</sup>, hereby respectfully submit this notice of no objection (this “Notice”) to the *Motion for Leave to File Legal Brief as Amicus Curiae by the Office of the Courts Administration of the Commonwealth of Puerto Rico* [ECF No. 18205] (the “Motion”), filed by the Office of the Courts Administration of the Commonwealth of Puerto Rico (“OAT,” for its Spanish acronym) on September 22, 2021, and respectfully state as follows:

1. The Motion seeks leave to file a legal brief as *amicus curiae* in relation to the *Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [ECF No. 17627] (as may be modified further, the “Plan”) and the *Disclosure Statement for the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [ECF No. 17628], a copy of which is attached to the Motion as Exhibit A (the “Brief”).

2. OAT contends the Plan’s treatment of the Judiciary Retirement System (“JRS”) benefits violates the Commonwealth’s Constitution and certain Puerto Rico Supreme Court precedent.

3. The Oversight Board disputes OAT’s characterization of the Plan’s treatment of the JRS benefits. However, the Oversight Board respectfully notifies the Court that it does not object to OAT filing the Brief, subject to reserving all substantive and procedural rights in connection with the Brief (including the right to object to its content).

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Dated: September 27, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Margaret A. Dale  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Hermann D. Bauer  
Hermann D. Bauer